

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

In re: CHRYSLER, LLC, et al,
Debtor,

Case No. 10 CV 2493

FILED
U.S. DISTRICT COURT
2010 APR 12 PM 1:43
S.D. OF N.Y.

MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE
Motion of Stephen W. Pidgeon

I, Stephen W. Pidgeon, request admission, *pro hac vice*, before this honorable court, to represent the Rejected Chrysler Dealers whose names are set forth below, in the matter of the appeal of the ORDER DENYING REJECTED DEALERS' MOTION FOR RECONSIDERATION OF THE JUNE 9, 2009 REJECTION ORDER AND THE JUNE 19, 2009 REJECTION OPINION, entered on February 5, 2010, Docket No. 6342 (the "Reconsideration Order").

The Rejected Dealers in this appeal are: ISLAND JEEP INCORPORATED (#26272); SCOTIA MOTORS INC (#54885); GOLDEN MOTORS (#68423); JOHN HINE Pontiac Mazda Dodge(#68445); PEN MOTORS INC. (#26517); BOB TAYLOR JEEP INC(#23695); MAURO MOTORS, INC. (#5977); BOLLINGER'S, INC. (#25078); BROTHER'S MOTORS INC./DIAMOND DODGE (#68771); ST PETE JEEP CHRYSLER (#26318); RALLYE AUTO PLAZA INC. (#44078); NEIL HUFFMAN INCORPORATED (#68107/#43947); BILL SPURLOCK DODGE, INC.(#43024); ROCK OF TEXAS

MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE - 1

PIDGEOON & DONOFRIO GP
3002 Colby Avenue, Suite 306
Everett, Washington 98201
(425)605-4774

AUTOMOTIVE INC (#60020); SOUTH HOLLAND DODGE (#43020); PRIDE CHRYSLER JEEP (#67773); THOMAS DODGE CORP (#44098); TAYLOR-PARKER MOTOR COMPANY (#67959); EVANSVILLE CHRYSLER INC (#66101); ALLEY'S OF KINGSPORT, INC. (#42002); AUGUSTA DODGE, INC. (#44615); M&M DODGE, INC. (#59731); SCHOLTES AUTO WORLD (#39834); AXELROD CHRYSLER INC. (#68191); FIORE CHRYSLER JEEP/JIM FIORE MOTORS(#60214); FAWS GARAGE(#62044); LAKES CHRYSLER JEEP LIMITED(#26448); VAN BURKLEO MOTORS INC(#23861); FISHER MOTORS INC(#23691); COURTESY NISSAN INC (#26294); KEY BUICK-PONT-AMC INC (#42569); SOUTHEAST AUTOMOTIVE (#23926); EXTREME JEEP INC (#26632); AMBASSADOR AUTO SERVICE, INC. (#24160); MUELLER CHRYSLER INC (#64826); WILSON DODGE NISSAN (#43679); PRESTON CHRYSLER JEEP (#63181); FORT MORGAN AUTO CENTER INC (#45143); SUPERIOR MOTORS INC (#24026); WACO DODGE SALES INC (#41132); ARCHER CHRYSLER JEEP (#66098); D PATRICK INC (#23717); BREHM GROUP INC(#68069); BIRMINGHAM CHRYSLER PLYMOUTH INC (#63747); CLARKSTON MOTORS INC (#67545); BERLIN CHRYSLER INC (# 65052); EL DORADO MOTORS INC (#68399); RUSSO GROUP ENTERPRISES INC (#63391); FOX HILLS CHRYSLER JEEP INC (#66924); ORLEANS DODGE CHRYSLER JEEP INC (#45231); WALKER MOTORS INC (#23005); MONICATTI CHRYSLER JEEP SALES (#61888); SHOEMAKER'S JEEP INC (#23178); SNOW, LLC/CHAMPION CHRYSLER (#44620); RAY'S FORD-MERCURY INC/RAY'S CDJ (#67191); BARBER BROS MOTOR CO INC (#67535); VAN LIESHOUT & SIMON DODGE (#51825); DRAKE CHRYSLER (#43097);

MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE - 2

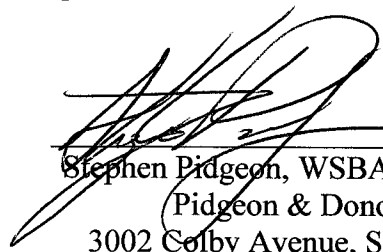
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Everett, Washington 98201
(425)605-4774

TENAFly CHRYSLER JEEP INC (#23109); WYCOFF CHRYSLER INC (#67977);
TERRY CHRYSLER JEEP INC (#67314); SOWELL AUTOMOTIVE INC (#43120);
SOUTH SHORE CHRYSLER (#64030); CIMINO BROTHERS FORD INC (#43961);
WILSON DODGE INC (#43679); KALMAR MOTOR SALES, INC (#23502); REUTHER
INVESTMENT CO (#23738); CONTINENTAL CHRYSLER JEEP INC (#26017); MT
CLEMENS DODGE INC (#59244); GOLICK CHRYSLER JEEP INC (#23492); BRUCE
CAMPBELL DODGE INC (#43102); CLAYTON AMERMAN INC (#53696);
AUFFENBERG CHRYSLER INC (#68628); and DUVALL CHRYSLER DODGE JEEP
INC (#60387); (hereafter, the "Rejected Dealers").

I certify that I am a member in good standing of the bar in the State of Washington,
and if applicable, the bar of the U.S. District Court for the Western District of Washington
and the U.S. District Court for the Eastern District of Washington. Enclosed is my most
recent Certificate of Good Standing issued in the State of Washington as of February ____,
2010.

I have submitted the filing fee of \$25.00 with this motion for pro hac vice admission.

Dated this 9th day of April, 2010, in Everett, Washington.



Stephen Pidgeon, WSBA#25265
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Everett, Washington 98201
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MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE - 3

PIDGEON & DONOFRIO GP
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: CHRYSLER, LLC, et al,
Debtor,

Case No. 10 CV 2493

~~Chapter 11~~
AFFIDAVIT OF ROBERT W. DAPELO IN
SUPPORT OF MOTION TO ADMIT

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Robert W. Dapelo, being duly sworn, hereby deposes and says as follows:

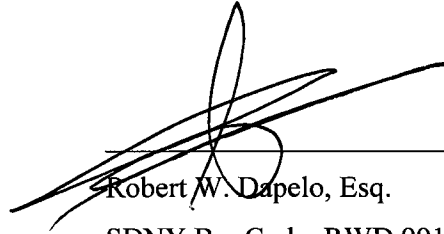
1. I am an attorney whose practice is in Patchogue, New York. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Stephen W. Pidgeon as counsel *pro hac vice* to represent the Certain Chrysler Dealers in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in December 9th 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Stephen W. Pidgeon since 2010.
4. Stephen W. Pidgeon is a partner of Pidgeon & Donofrio GP, located in Everett, Washington 98201.
5. I have found Stephen W. Pidgeon to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Stephen W. Pidgeon, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Stephen W. Pidgeon, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that this motion to admit Leo C. Donofrio, pro hac vice, to represent the Certain Chrysler Dealers in the above captioned matter, be granted.

Dated: April 8th 2010

City, State: Patchogue, New York

Respectfully submitted,



Robert W. Dapelo, Esq.
SDNY Bar Code: RWD 9918

Sworn before me this

8th April, 2010



Notary Public State of New York

KELLEY LAWSON
Notary Public, State of New York
No. 01LA6217374
Qualified in Suffolk County
Commission Expires February 8th, 2014

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 25265
)	
OF)	CERTIFICATE OF GOOD
)	
STEPHEN W. PIDGEON)	STANDING
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	
)	


I, Susan L. Carlson, Deputy Clerk of the Supreme Court of the State of Washington, hereby certify

STEPHEN W. PIDGEON

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on November 13, 1995, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.

IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed
the seal of said Court this 2nd day of
April, 2010.




Susan L. Carlson
Supreme Court Deputy Clerk
Washington State Supreme Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: CHRYSLER, LLC, et al,
Debtor,

Case No. 10 CV 2493

**ORDER FOR ADMISSION, PRO HAC VICE
ON WRITTEN MOTION**

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of attorney for ISLAND JEEP INCORPORATED, et al, and said sponsor
attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Stephen Pidgeon
Firm Name: Pidgeon & Donofrio, GP
Address: 3002 Colby Avenue, Suite 306
City/State/Zip: Everett, Washington 98201
Telephone/Fax: (425)605-4774 telephone; (425)818-5371 facsimile
Email Address: attorney@stephenpidgeon.com

is admitted to practice pro hac vice as counsel for in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
Chrysler LLC, et al., : Case No. 10 CV 2493
Debtors. :
-----X

CERTIFICATE OF SERVICE

I, STEPHEN PIDGEON, now certify that I caused the Motion to Admit Counsel (Stephen W. Pidgeon) Pro Hac Vice, the Affidavit of Robert W. Dapelo in Support of Motion to Admit Counsel (Stephen W. Pidgeon) Pro Hac Vice, the Order [proposed] for Admission Pro Hac Vice on Written Motion (admitting Stephen W. Pidgeon Pro Hac Vice); together with this Certificate of Service to be served on the following interested parties:

Jones Day Attn: Jeffrey B. Ellman, Esq. (Counsel To: The Debtors) 1420 Peachtree Street, N.E. Suite 800 Atlanta, GA 30309 Phone: 404-521-3939 Fax: 404-581-8330 Email: JBELLMAN@JONESDAY.COM	Jones Day Attn: Corinne Ball, Esq., Veerle Roovers, Esq. (Counsel to: The Debtors) 222 East 41st Street New York, NY 10017 Phone: 212-326-3939 Fax: 212-755-7306 Email: CBALL@JONESDAY.COM; VROOVERS@JONESDAY.COM
Jones Day Attn: David G. Heiman, Esq. (Counsel To: The Debtors) 901 Lakeside Avenue Cleveland, Ohio 44114 Phone: 216-586-3939 Facsimile: 216-579-0212	Office of the United States Trustee, SDNY Attn: Brian Masumoto, Esq. 33 Whitehall Street, 21st Floor New York, NY 10004 Phone: 212-510-0500 Fax: 212-668-2255 No Service by Email on the U.S. Trustee

This service was accomplished by first class U.S. Mail, postage prepaid this 9th day of April, 2010.


STEPHEN PIDGEON

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
Chrysler LLC, et al., : Case No. 10 CV 2493
Debtors. :
-----X

CERTIFICATE OF SERVICE

I, STEPHEN PIDGEON, now certify that I caused the REJECTED DEALERS' BRIEF
ON APPEAL together with this Certificate of Service to be served on the following interested
parties:

<p>Jones Day Attn: Jeffrey B. Ellman, Esq. (Counsel To: The Debtors) 1420 Peachtree Street. N.E. Suite 800 Atlanta, GA 30309 Phone: 404-521-3939 Fax: 404-581-8330 Email: JBELLMAN@JONESDAY.COM</p>	<p>Jones Day Attn: Corinne Ball, Esq., Veerle Roovers, Esq. (Counsel to: The Debtors) 222 East 41st Street New York, NY 10017 Phone: 212-326-3939 Fax: 212-755-7306 Email: CBALL@JONESDAY.COM; VROOVERS@JONESDAY.COM</p>
<p>Jones Day Attn: David G. Heiman, Esq. (Counsel To: The Debtors) 901 Lakeside Avenue Cleveland, Ohio 44114 Phone: 216-586-3939 Facsimile: 216-579-0212</p>	<p>Office of the United States Trustee, SDNY Attn: Brian Masumoto, Esq. 33 Whitehall Street, 21st Floor New York, NY 10004 Phone: 212-510-0500 Fax: 212-668-2255 No Service by Email on the U.S. Trustee</p>

This service was accomplished by first class U.S. Mail, postage prepaid, this 9th day of April, 2010.



STEPHEN PIDGEON